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<b>State:</b>	District of Columbia	<b>Filing Company:</b>	Zurich American Life Insurance Company
<b>TOI/Sub-TOI:</b>	H11G Group Health - Disability Income/H11G.003 Long Term		
<b>Product Name:</b>	Endorsement Group Disability		
<b>Project Name/Number:</b>	OFAC Endorsement/333		

## Filing at a Glance

Company:	Zurich American Life Insurance Company
Product Name:	Endorsement Group Disability
State:	District of Columbia
TOI:	H11G Group Health - Disability Income
Sub-TOI:	H11G.003 Long Term
Filing Type:	Form
Date Submitted:	12/16/2019
SERFF Tr Num:	ZUUG-132192270
SERFF Status:	Assigned
State Tr Num:	
State Status:	
Co Tr Num:	333
Implementation	On Approval
Date Requested:	
Author(s):	Jean Moriarity
Reviewer(s):	Colin Johnson (primary)
Disposition Date:	
Disposition Status:	
Implementation Date:	

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## General Information

Project Name: OFAC Endorsement	Status of Filing in Domicile: Authorized
Project Number: 333	Date Approved in Domicile: 10/23/2019
Requested Filing Mode: Review & Approval	Domicile Status Comments: none
Explanation for Combination/Other:	Market Type: Group
Submission Type: New Submission	Group Market Size: Small and Large
Group Market Type: Employer	Overall Rate Impact:
Filing Status Changed: 12/17/2019	
State Status Changed:	Deemer Date:
Created By: Jean Moriarity	Submitted By: Jean Moriarity
Corresponding Filing Tracking Number: ZUUG-132116019	

### Filing Description:

Zurich American Life Insurance Company is submitting a new endorsement for it's group long and short term disability policies and certificates. This endorsement adds a new general provision addressing ZALICO's requirement to comply with US sanctions laws and regulations regarding the payment of benefits and premium refunds. The endorsement will be attached to all Zurich group long and short term policies and certificates. For existing policyholder's with enforce business, the endorsement will be added at renewal or upon 45 days notice and the policyholder's signature will be required. This endorsement was recently approved by the DC Life Division under SERFF Filing ZUUG-132116019 on 11/8/2019. The content of the form submitted in this submission is identical to the form submitted to the life division.

The current group approved group long and short term disability forms were approved 2/1/11 under SERFF Filing No ZUUG-126985028.

The endorsement will be issued with the following approved group long and short term disability forms:

Policy form number 1000-ZAGP-01-01; Long Term Disability Certificate 2000-ZACERT-LTD-01-01; and Short Term Disability Certificate 3000-ZACERT-STD-01-01.

ZALICO markets group term life insurance to US employers who employ expatriates and non-US residents who require group term life insurance coverage. As employers expand into the global market, many companies want to offer their non-US based employee's life and disability benefits the same as their US resident employees. Some employers also hire non-US citizens on an in-patriate basis who are living and working in the US on a work visa or green card. These employees can have dependents and elect beneficiaries that are not residing in the USA. Zurich believes it is necessary to state in its policies that any payments or premium refunds due to policyholders, covered persons, or claimants may be delayed or withheld and reported to OFAC if such benefit or payment would violate any applicable trade or economic sanctions laws and regulations.

The endorsement does not replace any existing approved forms on file with the department. There is no rate impact by adding the endorsement so there is no Actuarial Memorandum enclosed.

The form contains minimal variability. A Statement of Variability is attached in the Supporting Documentation Tab.

You may contact me at [jean.moriarity@zurichna.com](mailto:jean.moriarity@zurichna.com) if you need any additional information.

## Company and Contact

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**Filing Contact Information**

Jean Moriarity, Director of Contract Development	jean.moriarity@zurichna.com
500 Enterprise Drive	215-370-6823 [Phone]
Rocky Hill, CT 06067	

**Filing Company Information**

Zurich American Life Insurance Company	CoCode: 90557	State of Domicile: Illinois
1299 Zurich Way	Group Code: 212	Company Type: Life and Annuity
Schaumburg, IL 60196	Group Name: Zurich North America	State ID Number:
(847) 605-6000 ext. [Phone]	FEIN Number: 36-3050975	

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**Filing Fees**

Fee Required?	No
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Retaliatory?	No
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Fee Explanation:

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## Form Schedule

**Lead Form Number: GP-SANC-EN-01**

Item No.	Schedule Item Status	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments
1		Endorsement	GP-SANC-EN-01	POLA	Initial		40.000	GP-SANC-EN-01 (10-9-19).pdf

### Form Type Legend:

<b>ADV</b>	Advertising	<b>AEF</b>	Application/Enrollment Form
<b>CER</b>	Certificate	<b>CERA</b>	Certificate Amendment, Insert Page, Endorsement or Rider
<b>DDP</b>	Data/Declaration Pages	<b>FND</b>	Funding Agreement (Annuity, Individual and Group)
<b>MTX</b>	Matrix	<b>NAP</b>	Network Access Plan
<b>NOC</b>	Notice of Coverage	<b>OTH</b>	Other
<b>OUT</b>	Outline of Coverage	<b>PJK</b>	Policy Jacket
<b>POL</b>	Policy/Contract/Fraternal Certificate	<b>POLA</b>	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider
<b>PRC</b>	Provider Contract/Provider Addendum/Provider Leading Agreement	<b>PRD</b>	Provider Directory

# Zurich American Life Insurance Company

Schaumburg, IL 60996

## ENDORSEMENT

**Endorsement Effective Date:** 1[January 1, 2020]

**2[Policyholder]:** 3[ABC Company]

**4[Policy] Number:** 5[12579]

**Eligible Class(es):** 6[All Classes]

**Lines of Coverage:** 7[All coverages under the [Policy]]

### THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

The following exclusion is added to the *GENERAL PROVISIONS* section of the [Policy], and each Certificate issued under the [Policy] as stated above.

#### GENERAL PROVISIONS: COMPLIANCE WITH OFAC REGULATION



Notwithstanding any other terms under 4[Policy]:

We shall not provide coverage; nor will we make any payments, or provide any service, or pay a benefit or refund premium to any person, entity, claimant, Beneficiary, or third party, who may have any rights under this 4[Policy], or a Certificate issued under the 4[Policy], to the extent that such coverage, payment, service, benefit, or activity, would violate any applicable trade or economic sanctions law or regulation.

#### ALL OTHER TERMS AND CONDITIONS OF THIS POLICY REMAIN UNCHANGED.

This Endorsement takes effect as of 12:01 a.m. on the Endorsement Effective Date at the address of the 2[Policyholder]. This Endorsement terminates on the date, and at the time the [Policy] terminates, or sooner, if agreed to by the 2[Policyholder] and us, subject to the cancellation provisions specified in the [Policy].

8[This Endorsement is signed by the Zurich American Life Insurance Company:

9	 PRESIDENT	}
9	 SECRETARY	}

10[\_\_\_\_\_  
[Policyholder] Signature]

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## Supporting Document Schedules

Satisfied - Item:	Statement of Variability
Comments:	See attached.
Attachment(s):	GP-SANC-EN-01 Endorsement SOV (10-9-19).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Readability Certification
Comments:	See attached
Attachment(s):	GP-SANC-EN-01 Readability Certification 50 (12-4-19).docx.pdf
Item Status:	
Status Date:	

# Zurich American Life Insurance Company

## Statement of Variability

October 9, 2019

### Form: GP-SANC-EN-01 Compliance With Trade or Economic Sanctions Law and Regulation Endorsement

#### Formatting of the Endorsement When Issued

The Endorsement will be issued in 8.5" x 11" format. We reserve the right to adjust margins, spaces, indentation, and alignment. When issuing the Endorsement, we will use a font size of no less than 10 point. We reserve the right to use a different font style. Commonly accepted rules of grammar, punctuation, and formatting will be applied to the form. Words that are defined will contain initial capital letters throughout the Endorsement where appropriate.

#### Variables

Areas of text that are variable are individually bracketed and labeled on the Endorsement to correlate with the Statement of Variability. Each set of brackets containing variables is labeled before first bracket with a subscript identifier in bold text. When the Endorsement is issued, the brackets and subscript identifiers will not be included and the space that they occupy will be closed. When text within the bracketed areas is deleted, spacing will be appropriately adjusted.

VARIABLE NUMBER	VARIABLE FIELD DESCRIPTION	PAGE	Variable Explanation
1	Endorsement Effective Date	1	The date is variable and will reflect the date the endorsement is issued.
2	[Policyholder]	1	"Policyholder" may be changed to: "contract holder"; "employer", "group", "employer", "participant" or similar industry term.
3	[ABC Company]	1	The name of the company shown is illustrative. The name of the policyholder will vary and the actual policyholder name will be inserted in an issued endorsement.
4	[Policy]	1	"Policy" may be changed to "contract", "group contract", "group master contract" or "group agreement".
5	Policy Number	1	The policy number shown is illustrative. The policy number applicable to the rider will be inserted in an issued endorsement.
6	Eligible Class[es]	1	The name of the applicable class will be inserted in each issued endorsement.
7	Lines of Coverage	1	The lines of group insurance coverage will be identified such a group term life or group disability for the certificates to which the endorsement applies for each eligible class.
8	Signature Line	1	This item will be included if the endorsement is issued after the policy effective date and officer signatures are required. If issued with the policy this item will be omitted.
9	Officer Signatures	1	If included, the officer names in an issued Endorsement may be changed to reflect the current officers of the company.
10	Policyholder Signature	1	The policyholder signature will be required if the endorsement is issued separately from the policy, otherwise this item will be omitted in an issued endorsement.

## ZURICH AMERICAN LIFE INSURANCE COMPANY

## READABILITY CERTIFICATION

December 4, 2019

I hereby certify on behalf of Zurich American Life Insurance that the accuracy of the Flesch reading ease test score for the following policy forms. The forms are at least 10 (ten) point type, 1 (1) point leaded. The score is shown below. The endorsement form was scored as part of the entire group insurance policy.

TITLE	FORM NUMBER	FLESCH SCORE
Endorsement	GP-SANC-EN-01	50
Policy	1000 ZAGP-01-01	

DocuSigned by:



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David Dampman, Vice President of Operations